

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

JAMES PHILLIPS, and ROBERT
SAEMIAN,
Plaintiffs
v.
WIPRO LIMITED,
Defendant.

CIVIL ACTION NO. 4:18-CV-00821

DEFENDANT'S SUPPLEMENTAL DESIGNATIONS

Defendant Wipro Limited expects to present the following witnesses at the trial of this matter:

A. Defendant will call the following witnesses:

1. Ramesh Dariya

Dariya is a manager for Global Immigration Management Services and may offer testimony regarding Defendant's immigration process, including the application process for H-1B visas, the means for tracking the visa status of visa-dependent employees and the coordination of the immigration process with the Workforce Management Group.

2. Suresh Kumar

Kumar was the Project Manager on the Dish Network project in Denver and may offer testimony about the individuals who worked on the account and the job duties and performance of those individuals.

3. Biswajit Mishra

Mr. Mishra is a director of human resources and may offer testimony regarding Defendant's human resources policies and procedures with regard to discrimination, promotions, and terminations. Mr. Mishra replaces Tarika Mitchelson who has left the Company.

4. Ganesamoorthy Muthusamy

Muthusamy is head of the U.S. Workforce Management Group. He may offer testimony regarding the deployment and flow of U.S. employees, including the internal fulfillment process through which

projects are staffed, Defendant's contract hiring process, Defendant's benching and allocation process, and Defendant's localization efforts.

5. Kishore Nekkalapudi

Nekkalapudi was an account manager for the Dish Network project in Denver and may offer testimony regarding the individuals who worked on the account with Plaintiff Phillips and the job duties and performance of those individuals.

6. Richard Prime

Prime was the Global EAM Practice Lead during the relevant timeframe and may offer testimony regarding Plaintiff Saemian's employment and termination and Defendant's policies and procedures.

7. Monica Rodrigues

Rodrigues is a human resources manager and may offer testimony regarding Defendant's human resources policies and procedures with regard to discrimination, promotions, and terminations.

8. Himanshu Srivastava

Srivastava is the senior manager for U.S. talent acquisition. He may offer testimony regarding Defendant's process for lateral hiring and recruitment in the U.S.

9. Sammy Seiffedine

Seiffedine is a Senior EAM/RCM Consulting Manager at Wipro and may offer testimony regarding Plaintiff Saemian's employment and termination.

10. Dr. Sumit Ganguly, Ph.D.

Dr. Ganguly may offer testimony as an expert on Indian politics and society, including the socio-cultural diversity of India, including the diversity of language and religion. Dr. Ganguly may also offer testimony regarding India's affirmative action program ("positive discrimination"), sub-national identities, and social class division, and the use of English among Information Technology workers from India.

B. Defendant does not anticipate calling these witnesses at this time but may call them if certain evidence or testimony is admitted by the Court:

1. Dr. Stephen G. Bronars, PhD

Dr. Bronars may offer testimony as an economic expert to rebut the opinions of Plaintiffs' expert Dr. David Neumark regarding the statistical significance of the promotion and termination rates of non-South Asians as compared to South Asians.

2. Stuart Deignan

Deignan was Plaintiff Saemian's supervisor during the relevant timeframe and may offer testimony regarding Plaintiff Saemian's employment and termination and Defendant's policies and procedures.

3. Shankar Kumararsamy

Kumarasamy worked on the Dish Network account in Denver and may offer testimony about the individuals who worked on the account and the job duties of those individuals.

4. Shravan Kumar Naik

Naik may offer testimony regarding declarant Gregory Maclean's efforts to find a position while he was on the bench.

5. Giritharan Shanmugaraj

Giritharan Shanmugaraj may offer testimony regarding declarant Gregory Maclean's refusal to relocate for a position while he was on the bench

6. Pramod Nair

Nair may offer testimony regarding declarant Ardeshir Pezeshki's employment with Wipro.

7. Rajesh Damodaran

Damodaran may offer testimony regarding declarant Ardeshir Pezeshki's employment and termination from employment with Wipro.

8. Aarthi Krishnaswami

Krishnaswami may offer testimony regarding declarant John Singer's efforts to find a position while he was on the bench and his refusal to relocate for a position.

9. Chandra Surbhat

Surbhat may offer testimony regarding declarant Ardeshir Pezeshki's employment with Wipro.

10. Custodians of record for the Plaintiffs' medical providers.

11. Custodians of record for the Plaintiffs' previous and subsequent employers.

Defendant reserves the right to examine and/or cross-examine any witnesses called by Plaintiff, and also may call rebuttal and/or impeachment witnesses.

Dated: June 24, 2022

Respectfully submitted,

By: /s/ Kerry E. Notestine

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CERTIFICATE OF SERVICE

I certify that on June 24, 2022, I filed the foregoing document using the Court's CM/ECF system, which automatically sent notice to the following counsel of record:

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